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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

United States of America)	
)	
vs)	Docket No. 04-10288-RWZ
)	
Jason Matthews, Defendant)	

DEFENDANT'S MOTION FOR A PRE-PLEA PRESENTENCE INVESTIGATION

The defendant moves that the Probation Department be directed to conduct a pre-plea presentence investigation, in the above-referenced case, particularly with reference to the issues of the defendant's criminal history category and potential guideline range.

These issues are critical, since the range of imprisonment, under the Sentencing Guidelines, appears to vary, significantly, depending on the resolution of these issues.

By his Attorney

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Marsed Mysul Toletal Joyan Joseph